

ATTACHMENT 47



Promenade II
1200 Peachtree St.
Atlanta, GA 30309

September 30, 1997

Jan Burriss
BellSouth Telecommunication Inc.
Suite 410
1960 West Exchange Place
Tucker, GA 30084

Dear Jan:

This letter addresses several major Customer Usage issues that need immediate attention and resolution:

INFORMATION SERVICE PROVIDERS

BellSouth's September 23, 1997, letter concerning Information Service Providers is completely unacceptable. First, BellSouth states it will provide rated NII messages as required by the Interconnection Agreement only after it makes major enhancements to its billing system and will advise AT&T when BellSouth has a firm date. On May 30, 1996, AT&T received a confirmation letter from BellSouth (Craig Steele) stating that BellSouth would not continue to bill the Information Service Providers as requested by AT&T but would provide AT&T rated messages. Now, 16 months later, BellSouth is stating it has to make major systems enhancements to provide rated Information Service Provider messages. The system enhancements should have been completed months ago.

Furthermore, AT&T was never informed that BellSouth could not transmit rated ISP messages. AT&T discovered the problem when verifying the Customer Usage Records. For several months, BellSouth committed to transmit the rated messages. Last week is the first time BellSouth stated that rated Information Service Provider messages will not be provided until BellSouth is ordered to do so. Later, BellSouth stated that it will rate the messages and would send a letter confirming this position.

Second, BellSouth is now telling AT&T (on the last Customer Usage Call and in the September 23, 1997 letter) that it will send two records, the 010116 record rated and the 100131/01 record/s unrated. Since the terminating point is XXX-976, AT&T does not know the terminating location; thus, cannot rate or bill the call. Therefore, AT&T needs to receive all the records rated. Also, 100131/01 records are not valid Information Service Provider records according to BellCore standards.

Until BellSouth provides the proper rated messages so AT&T can bill the customer properly, AT&T expects BellSouth to bill the Information Service Providers on AT&T's behalf.

Please let me know by October 7, 1997, if BellSouth is willing to bill the Information Service Providers as requested, and when BellSouth will provide the rated records/s as stated in the signed Interconnection Agreements.

LD PIC REJECTS

Recently, AT&T's LD PIC SME was requesting information on LD PIC Rejects, and was told by the BellSouth SME that BellSouth does not reject IXC LD PIC Change orders and notify the IXC that a CARE PIC record should be sent to AT&T unless AT&T specified a LD PIC Freeze on the Provisioning Order. This is not what AT&T negotiated, nor is this policy in compliance with Section 7, Paragraph 8.4 of the Interconnection Agreement. Please notify all BellSouth PIC SMEs that BellSouth should reject any IXC LD PIC order on any AT&T Local customer. Also, please respond in writing by October 7, 1997 that this problem has been corrected.

CUSTOMER USAGE MATRIX

AT&T is again requesting that BellSouth verify the state specific Customer Usage Matrix transmitted under separate cover. The matrix includes the information BellSouth originally provided to AT&T as it agreed to do during negotiations in May, 1996. However since that time, BellSouth has made numerous verbal corrections; therefore, the matrix has become outdated and AT&T is now unsure if it has captured all of the changes, i.e. record types, BellSouth deviations from the BellCore standard, the service availability by state, etc. Please have the BellSouth SMEs verify the matrix and respond by October 7, 1997 with any corrections.

CUSTOMER USAGE RECORDS/RETURNS FEED/CLAIMS PROCESS

AT&T is again requesting that BellSouth establish a "Returns Feed" so AT&T can return unbillable messages that resulted due to a BellSouth error. So far, during the trial period, AT&T has purchased more than 600 incorrect messages that AT&T cannot utilize to bill end-user customers. The Returns Feed would alleviate several problems including: the need for manual reports, the need to waste time discussing incorrect messages, and the need to establish a cumbersome Claims Process.

- **Manual Reports** - AT&T SMEs are spending numerous hours weekly analyzing incorrect Customer Usage Records and developing reports to send to BellSouth so it can resolve the problems.

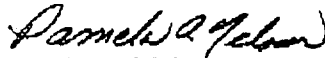
- **Incorrect Messages** - AT&T SMEs, in conjunction with BellSouth SMES, are spending numerous hours discussing the incorrect usage records listed on the weekly reports. For the most part, these problems are still unresolved; thus, AT&T cannot, nor does it know when it will begin receiving accurate messages so it can bill its customers accurately and timely. AT&T needs to know ASAP, but no later than October 7, 1997, when the Customer Usage problems, as indicated on the last weekly report, will be resolved.
- **Claims Process** - Since BellSouth does not have a Returns Feed, a Claims Process must be negotiated so that AT&T can be reimbursed for the unbillable usage records AT&T purchases. This will be a labor intensive manual process on both the part of AT&T and BellSouth.

Please verify by October 7, 1997, that BellSouth would be willing to set-up a Returns Feed to alleviate the problems as discussed above. If not, please reply with the BellSouth's SMEs availability for the third or fourth week in October to begin developing the Claims Process.

AT&T is asking for BellSouth's written response to each of the above issues by October 7, 1997, because each is critical to AT&T's market entry plans.

If you have questions, please call me on 404-810-3100 or Sue Ray on 404-81-3123.

Sincerely,



Pamela A. Nelson

cc: Sue Ray
Foster Haley
Margaret Garvin
Mer Thompson
Al Calabrese
Barbara Jenkins
Jim Hill
Jill Williamson
Barbara Dietsch

ATTACHMENT 48

BellSouth Telecommunications, Inc.
Docket No. 960786-TL
Stacy Deposition
August 14, 1997
Late Filed Exhibit No. 10
Page 1 of 1

REQUEST: The CMUC - list of upcoming changes to LENS, priority of changes and expected completion dates if available.

RESPONSE: Please refer to the attached information.

INFORMATION SPONSORED BY:

William N. Stacy
AVP - Interconnection Operations
675 West Peachtree St.
Atlanta, GA 30375

Number	System	Priority	Abstract/Title	State	Owner	Originator	Date Needed
1030	LENS	1_Urgent	Add ability for ordering LNP	open	Hawkins, Stan	Daniels, Cassandra A.	10/15/97
1164	LENS	1_Urgent	LOOP	working	Johnson, Karen D.	Soteropoulos, Jeannette	10/15/97
1166	LENS	1_Urgent	PORT	working	Johnson, Karen D.	Soteropoulos, Jeannette	10/15/97
1167	LENS	1_Urgent	INP - Interim Number Portability	working	Johnson, Karen D.	Daniels, Cassandra A.	10/15/97
1168	LENS	1_Urgent	LINP - Loop with Interim Number Portability	working	Johnson, Karen D.	Soteropoulos, Jeannette	10/15/97
1169	LENS	1_Urgent	LOOP/PORT combination	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1170	LENS	1_Urgent	Support UNE - LOOP w/Interoffice Transport	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1171	LENS	1_Urgent	Support UNE - LOOP w/Interoffice Transport and LNP	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1172	LENS	1_Urgent	CGI ordering ability	open	Hawkins, Stan	Daniels, Cassandra A.	10/15/97
1182	LENS	1_Urgent	Allow for ordering of DID blocks via LENS	open	Hawkins, Stan	Daniels, Cassandra A.	10/15/97
1187	LENS	1_Urgent	Add ability for assigning TERS	open	Hawkins, Stan	Daniels, Cassandra A.	10/15/97
1188	LENS	1_Urgent	Add ability for ordering svc w/MHL	open	Hawkins, Stan	Daniels, Cassandra A.	10/15/97
1190	LENS	2_High	Modify LENS to provide tag value	open	Hawkins, Stan	Daniels, Cassandra A.	12/15/97
1192	LENS	3_Medium	Color-Coding Fields (Java/MOTIF)	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1194	LENS	1_Urgent	PBX trunks in LENS	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1220	LENS	2_High	Incorporate password aging to meet our security variance.	verify	Johnson, Karen D.	Johnson, Karen D.	12/15/97
1221	LENS	4_Low	Translate LEO Fatal error messages to human-readable messages.	open	Hawkins, Stan	Johnson, Karen D.	4/15/98
1274	LENS	2_High	Phase 2 Data Elements (CR0026D)	working	Johnson, Karen D.	Romano, Martha	12/15/97
1279	LENS	2_High	Long-Term Enhanced FOC	open	Hawkins, Stan	Romano, Martha	12/15/97
1282	LENS	3_Medium	Separate Test Regions - CLEC Testing	open	Hawkins, Stan	Ford, Randy	2/15/98
1286	LENS	3_Medium	Labs	open	Hawkins, Stan	Soteropoulos, Jeannette	2/15/98
1288	LENS	2_High	Jeopardies	working	Johnson, Karen D.	Soteropoulos, Jeannette	12/15/97
1289	LENS	2_High	LSR Router	working	Johnson, Karen D.	Soteropoulos, Jeannette	12/15/97
1290	LENS	1_Urgent	Regional Testing (Enhanced)	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1296	LENS	1_Urgent	Regional Testing (Basic - w/o Needed Enhancements)	open	Hawkins, Stan	Soteropoulos, Jeannette	10/15/97
1553	LENS	3_Medium	Add additional logic to calculate additional switches	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1593	LENS	3_Medium	LENS calculate due date differently for Conv as is & Disconnect	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1594	LENS	2_High	Provide ability in LENS to shorten search of IC/Prod/Svc lists	open	Hawkins, Stan	Daniels, Cassandra A.	12/15/97
1597	LENS	3_Medium	LENS to include the section of LSR along with field in error	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1598	LENS	3_Medium	LENS to display english associated with listing types	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1599	LENS	3_Medium	LENS to include update of services offered in April LEO IG	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1600	LENS	3_Medium	Provide ability in LENS to populate the Carrier name	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1601	LENS	2_High	Provide ability in LENS to process Change "C" orders	open	Hawkins, Stan	Daniels, Cassandra A.	12/15/97
1602	LENS	3_Medium	Specify screens in LENS to eliminate need for scrolling	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1603	LENS	3_Medium	Additional Features to be added for Firm Orders	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1604	LENS	2_High	Provide ability in LENS to default service type and state	open	Hawkins, Stan	Daniels, Cassandra A.	12/15/97
1605	LENS	2_High	Provide ability in LENS to populate TE field on Billing screen	open	Hawkins, Stan	Daniels, Cassandra A.	12/15/97

Number	System	Priority	Abstract/Title	State	Owner	Originator	Date Needed
1706	LENS	3_Medium	Want a confirmation number after TN reserve	open	Hawkins, Stan	Sample, Rita Marie	2/15/98
1707	LENS	3_Medium	LENS to allow CLECs to select multiple svcs, & display features	open	Alvis, Mykel	Daniels, Cassandra A.	2/15/98
1708	LENS	3_Medium	LENS to advise CLECs of system changes via Release Notes	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
1744	LENS	1_Urgent	Statistical Reports	verify	Johnson, Karen D.	Dougherty, Chuck	10/15/97
1785	LENS	3_Medium	Printing of CSR's	verify	Johnson, Karen D.	Davidson, Jennifer	2/15/98
1803	LENS	3_Medium	LENS to populate data from CSR to LSR	open	Hawkins, Stan	Rand, Pat	2/15/98
1804	LENS	3_Medium	LENS to process requests for changes in directory assistance	open	Hawkins, Stan	Rand, Pat	2/15/98
1853	LENS	1_Urgent	Test Company Code 8001	open	Hawkins, Stan	Smith, Maggie	10/15/97
1859	LENS	3_Medium	Obtain Q Account BNA from BORCIS rather than CLEC Table	open	Hawkins, Stan	Talbert, Jim	2/15/98
1864	LENS	2_High	LENS Firm Order Process Modification	open	Hawkins, Stan	Rand, Pat	12/15/97
1876	LENS	2_High	Consolidate CLEC Profiles of LENS, LEO & LESOG	open	Hawkins, Stan	Rand, Pat	12/15/97
1885	LENS	3_Medium	LSI (Local Service Itemization)	open	Hawkins, Stan	Wilcox, Shirley	2/15/98
1886	LENS	3_Medium	CSR - Plus 55 Pages	open	Hawkins, Stan	Wilcox, Shirley	2/15/98
1905	LENS	1_Urgent	CSR Credit History	working	Johnson, Karen D.	Wilcox, Shirley	10/15/97
1908	LENS	3_Medium	CSR - Expanded TN Number/Miscellaneous Number	working	Johnson, Karen D.	Wilcox, Shirley	2/15/98
1910	LENS	3_Medium	CSR Access Using Circuit Number	working	Johnson, Karen D.	Wilcox, Shirley	2/15/98
1911	LENS	1_Urgent	Eliminate Calling Card/Credit Card Info from CSRs	open	Hawkins, Stan	Wilcox, Shirley	10/15/97
1913	LENS	2_High	Create Database to Track CSR Accesses	open	Hawkins, Stan	Wilcox, Shirley	12/15/97
2108	LENS	2_High	Must modify LENS DB to allow multiple Q-acct #s	open	Hawkins, Stan	Timms, Arthur	12/15/97
2109	LENS	2_High	Must modify LENS to add logic to select correct Q-acct	open	Hawkins, Stan	Timms, Arthur	12/15/97
2113	LENS	3_Medium	LENS On-line Help	working	Johnson, Wade	Hale, Wanda	2/15/98
2121	LENS	2_High	Add anchors to web pages	open	Hawkins, Stan	Timms, Arthur	12/15/97
2166	LENS	2_High	LENS order fea/fea details not displaying in LEO on act=V.	returned	Hawkins, Stan	Rand, Pat	8/1/97
2184	LENS	3_Medium	LENS must increase quantity of TNs retrieved from 10 to 25	open	Hawkins, Stan	Daniels, Cassandra A.	2/15/98
2185	LENS	1_Urgent	LENS must display information about features w/o USOCs	working	Timms, Arthur	Timms, Arthur	10/15/97
2190	LENS	2_High	LENS must process ALL LEO statuses	working	Johnson, Karen D.	Timms, Arthur	12/15/97
2191	LENS	1_Urgent	LENS must display MemoryCall and RACF access #s	open	Hawkins, Stan	Timms, Arthur	10/15/97
2223	LENS	2_High	Need a server to store session information	working	Pierce, Ronald	Alvis, Mykel	12/15/97
2226	LENS	2_High	Need to move Navigator code into each ORB	working	Pierce, Ronald	Alvis, Mykel	12/15/97
2229	LENS	4_Low	Disable NEXT button on View LSR Errors page when no more PONs	working	Hoskins, Brian	Dickerson, Mike	4/15/98
2233	LENS	1_Urgent	LENS must add ability for LCSC users to change company code	open	Hawkins, Stan	Timms, Arthur	10/15/97
2234	LENS	1_Urgent	LENS to provide positive ack on pw change	open	Hawkins, Stan	Timms, Arthur	10/15/97
2254	LENS	3_Medium	SOER error - PDN data missing or invalid	open	Hawkins, Stan	Harrison, Elaine	2/15/98
2255	LENS	1_Urgent	TCIF issue 7	open	Hawkins, Stan	Vines, Crystall	10/15/97
2257	LENS	1_Urgent	LENS must add support for supplement types 1, 2, 3	open	Hawkins, Stan	Timms, Arthur	10/15/97
2258	LENS	1_Urgent	Quick Service	working	Johnson, Karen D.	Timms, Arthur	10/15/97
2259	LENS	1_Urgent	Due Date Calculation Process	open	Hawkins, Stan	Timms, Arthur	10/15/97

Number	System	Priority	Abstract/Title	State	Owner	Originator	Date Needed
2260	LENS	1_Urgent	Response time issues	open	Hawkins, Stan	Timms, Arthur	10/15/97
2273	LENS	1_Urgent	Rejects/Fatal Edits	open	Green, Amy	Timms, Arthur	10/15/97
2274	LENS	1_Urgent	Rejects/Clarification	open	Hawkins, Stan	Timms, Arthur	10/15/97
2279	LENS	1_Urgent	Change Designer Listings	open	Hawkins, Stan	Timms, Arthur	10/15/97
2291	LENS	1_Urgent	State-specific testing - South Carolina	open	Hawkins, Stan	Talbert, Jim	10/15/97
2292	LENS	1_Urgent	State-specific testing - Louisiana	open	Hawkins, Stan	Talbert, Jim	10/15/97
2293	LENS	1_Urgent	State-specific testing - Kentucky	open	Hawkins, Stan	Talbert, Jim	10/15/97
2294	LENS	1_Urgent	State-specific testing - Florida	open	Hawkins, Stan	Talbert, Jim	10/15/97
2295	LENS	1_Urgent	State-specific testing - Georgia	open	Hawkins, Stan	Talbert, Jim	10/15/97
2296	LENS	1_Urgent	State-specific testing - North Carolina	open	Hawkins, Stan	Talbert, Jim	10/15/97
2297	LENS	1_Urgent	State-specific testing - Alabama	open	Hawkins, Stan	Talbert, Jim	10/15/97
2298	LENS	1_Urgent	State-specific testing - Mississippi	open	Hawkins, Stan	Talbert, Jim	10/15/97
2299	LENS	1_Urgent	State-specific testing - Tennessee	open	Hawkins, Stan	Talbert, Jim	10/15/97
2432	LENS	5_Cosmetic	IC-REF to LENS Platform	open	Hawkins, Stan	Spradlin, Richard C.	4/15/98
2488	LENS	2_High	Change usage of TE field to optional	open	Hawkins, Stan	Johnson, Karen D.	12/15/97
2489	LENS	4_Low	Change usage of IMPCON and IMPCON TEL to required.	open	Hawkins, Stan	Johnson, Karen D.	4/15/98
2490	LENS	4_Low	Change address valid. screen to display working/nonworking TNs.	open	Hawkins, Stan	Johnson, Karen D.	4/15/98
2491	LENS	3_Medium	Modify View Order Status Option to display HC.	open	Hawkins, Stan	Johnson, Karen D.	2/15/98
2492	LENS	2_High	Modify user profile to associate multiple company codes	open	Hawkins, Stan	Johnson, Karen D.	12/15/97

ATTACHMENT 49

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:

CONSIDERATION OF BELL SOUTH
TELECOMMUNICATIONS, INC.'S SERVICES
PURSUANT TO SECTION 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

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:
Docket No. 6863-U
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:
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Room 177
244 Washington Street
Atlanta, Georgia

Wednesday, July 16, 1997

The above-entitled matter came on for hearing
pursuant to adjournment at 1:00 p.m.

BEFORE:

STAN WISE, Chairman
ROBERT BAKER, Vice Chairman
MAC BARBER, Commissioner
DAVID BAKER, Commissioner
ROBERT DURDEN, Commissioner

Brandenburg & Hasty
231 Fairview Road
Ellenwood, Georgia 30049

I N D E XWITNESSES:

	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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Keith Milner

By Mr. Ross	3812	--	3965	--
By Mr. Hopkins	--	3854	--	--
By Mr. Rice	--	3873	--	--
By Mr. Soriano	--	3879	--	--
By Ms. McMillin	--	3890	--	--
By Mr. Atkinson	--	3932	--	--
By Mr. Woods	--	3946	--	--
By Ms. Gibson	--	3951	--	--

Joseph Gillan

By Mr. Lamoureux	3972	--	--	--
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William Stacy

By Mr. McCallum	4032	--	4138	--
By Ms. Rhodes	--	4066	--	--
By Mr. Rice	--	4087	--	--
By Mr. Adelman	--	4093	--	--
By Mr. Atkinson	--	4125	--	--
By Mr. Woods	--	4128	--	--
By Ms. Gibson	--	4136	--	--

Robert Scheye

By Mr. Ellenberg	4142	--	--	--
By Mr. Hopkins	--	4169	--	--
By Ms. Ward	--	4174	--	--

EXHIBITS:

	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
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AT&T:

21	3866	
22	3868	

BellSouth:

53 and 54	3971	3971
55 through 60		
61, 62, 63	4166	

1 about -- you'll see that BellSouth's performance at the
2 regional level or at the Georgia level varies every month,
3 and it can vary from meeting 99 percent of the due dates to
4 the week after the hurricane meeting 85 percent of the due
5 dates. And it varies from month to month.

6 There is an accepted statistical process for
7 taking that varying measurement and establishing two
8 parameters called upper and lower control limits that tell
9 you whether the process that you're using to do that with is
10 the same or changing. And that is recalculated every month
11 when the new results come in.

12 What we propose to do is to use that measure, use
13 BellSouth's historical data to establish the upper and lower
14 control limits, and then show the CLECs actual results for
15 that same measure on top of BellSouth's results. Our
16 contention is that as long as the results are inside the
17 upper and lower control limits, the process used to provide
18 those results is by definition the same and that, by
19 definition, provides parity.

20 One other additional thing. I had testified in my
21 previously filed testimony that a series of tests to compare
22 OSS response times had begun. However, I met on June 26

1 with the Department of Justice and determined that my
2 proposed method of collecting the data would not be
3 satisfactory to their experts. I returned from that meeting
4 and immediately set the process in motion to produce the
5 response time comparisons collected programmatically at the
6 system level that would comply with that request. The
7 results of this work are not available and will not be
8 complete yet for some time because it required considerable
9 changes in our systems and the measurement points we had in
10 the system. I believe, however, that day before yesterday,
11 you saw the visible results of how quickly the LENS -- how
12 quickly LENS responds on the four types of requests we've
13 been talking about.

14 Finally, as the Commission knows, establishing
15 adequate service performance measures to ensure that all
16 telecommunications customers in Georgia receive high quality
17 service is important. Regardless of whether that service is
18 provided by BellSouth, whether it's provided by a CLEC using
19 BellSouth services, whether it's provided by a CLEC using
20 unbundled network elements provided by BellSouth, or whether
21 it's provided by a CLEC using entirely their own facilities,
22 the quality of the service for the end user, the customer,

1 negotiations would continue discarding some of these
2 measures and adding additional measures.

3 Q And what about measure for network performance?
4 Are those included in attachment 12?

5 A The sole measure of network performance in this
6 particular agreement that we have proposed is the measure of
7 the performance of the trunk network. It includes the
8 measures on interconnect trunking that show both the ability
9 to provide and maintain trunks.

10 Q And would you agree that perhaps there are other
11 appropriated measures for network performance that should be
12 incorporated into --

13 A I have agreed already there are several hundred
14 thousand points in this network that we could measure it.
15 The negotiation was an attempt to reduce that hundred
16 thousand points to some manageable agreed to set of data
17 between AT&T and BellSouth.

18 Q Okay. Now, you mentioned in your summary that you
19 don't now have available the data you had said might be
20 available today, which were studies, I believe, comparing
21 LENS to RNS and LESOG to DOE, is that correct?

22 A LENS to RNS and in Georgia's case to DOE.

1 Q And you said that you were unable to complete
2 these because of a presentation you made with the DOJ?

3 A I had started conducting the studies in a fashion
4 that our statisticians believed were statistical valid. We
5 visited with the DOJ on June 26th and determined from their
6 comment and the comments on the AmeriTech petition that
7 those measures were going to be -- have to be collected
8 programmatically which was an entirely different method than
9 I was using to collect the data and I had to come back and
10 start over.

11 Q Can you explain the difference in the way they
12 wanted to see it collected and the way you had begun
13 collecting it?

14 A They wanted to see it collected at the back end of
15 the computer system instead of the front end. We were
16 collecting it at the user's screen view of the system. They
17 want it collected programmatically inside the system at a
18 particular point.

19 Q And did they explain why they wanted to see it
20 that way?

21 A They believed that was more consistent, apples to
22 apples comparison point, than what we had done originally.

1 Q Okay.

2 A We were in process of making the cases, as I
3 stated in there saying, okay, a BellSouth rep does it this
4 way, punches a button and the data shows up on the screen in
5 front of him or her in a certain amount of time and the LENS
6 user does a similar thing and it shows up in a certain
7 amount of time. They wanted to eliminate the human variable
8 from that condition and have it measured programmatically at
9 a different point.

10 Q And you're in the process of making these changes.
11 Do you know when you may have a date available?

12 A I think some of y'all heard me say in South
13 Carolina I had given the specifications to the programmers.
14 I'm always hesitant until I get a firm date back from the
15 programmers and then I add a couple of weeks to it as far as
16 when they're going to be done.

17 Q Okay.

18 A I do not have a date yet as to when we can collect
19 it in that fashion.

20 Q Are these tests being performed solely within
21 BellSouth?

22 A They will be solely within BellSouth because the

ATTACHMENT 50

AT&T's Monthly Surveillance Report
Operational Support Systems (OSS) Interfaces
August 22, 1997

1. Introduction

The interconnection agreement executed between BellSouth and AT&T on February 3, 1997, requires the parties to work together to develop and implement permanent electronic interfaces by December 31, 1997. Until that time, the agreement provides for a number of interim interfaces. The purpose of this report is to provide the Commission with information on the progress toward meeting the December 31, 1997 deadline for permanent electronic interfaces and the status of the interim measures currently being utilized. In addition, AT&T will respond to BellSouth's August 1, 1997, update on the status of developing the Pre-Ordering Gateway pursuant to the Commission's Order of January 22, 1997, report.

Beginning with the BellSouth February 17, 1997 report to the Commission, in Docket 6352-U, BellSouth's monthly report stated, *"The Commission has further required that this type of report be filed as a result of the AT&T, MCI/metro and Sprint arbitration proceedings. This report has been expanded to accommodate the requirements of the arbitration awards in those proceedings, including but not limited to the Commission's requirement that BellSouth provide monthly reports on the status of developing secure access to customer service record information pursuant to this Commission's arbitration orders."* However, until August 1, 1997, BellSouth had not provided any information on the permanent interfaces ordered by the arbitration decisions other than status of the interface for Customer Service Records.

In AT&T's Response to BellSouth's 1997 April Operational Interface Report filed on May 14, 1997, AT&T reported that AT&T approached BellSouth regarding the filing of joint reports to keep the Commission apprised of the status of implementation of the permanent interfaces required by the BellSouth/AT&T interconnection agreement, and that BellSouth subsequently offered the following procedure, which AT&T accepted:

- BellSouth will prepare the initial draft of the report to be filed by the 15th of each month reporting on the results of the prior month.
- BellSouth will provide a copy of the draft to AT&T by the 5th of each month for review and comment.
- The first report to include status of the permanent interfaces will be filed July 15.

BellSouth did not meet its commitment to provide AT&T with a draft by July 5, therefore no July report on permanent interfaces was filed with the Commission. AT&T continued to work with BellSouth to provide the Commission with a joint report on the status of the permanent operational interfaces.

On August 8, 1997 BellSouth notified AT&T that BellSouth would not provide status to the Commission on the Ordering and Billing processes. Due to

BellSouth's decision to only provide a partial status, AT&T decided to file independent reports on the status of the implementation of all its operational interfaces beginning in August, 1997.

For purposes of this report, the following definitions, previously agreed to with BellSouth, are used:

Mutually Agree to Requirements/Specification (JIA)

- Both parties review and document their understanding of the specifications and all exceptions to those specifications.

Develop Test Plan

- Both parties will define roles, acceptance criteria, exit criteria, test cases, test phases and durations.

Perform Joint Testing

- Interface to Interface
- End to End

Dev. Work Center. Operational Agreement

- Document all exceptions that have been defined in the testing phases and the mutually agreed upon appropriate handling of those exceptions
- Provide impacted center procedures and contact information

Move to Production

The date AT&T begins Service Readiness Testing (SRT) and transmits live data to BellSouth's production system.

2. Pre-Ordering

2.1 Regional Street Address Guide (RSAG) Access

RSAG is the system BellSouth uses to obtain access to street address information. AT&T requires the information contained in this system to order service because BellSouth requires a character-for-character match to process orders. Beginning on August 6, AT&T experienced problems ranging from extremely limited access to no access to the RSAG database. After escalation to the executive level, performance improved. However, AT&T is still experiencing serious problems accessing RSAG and therefore only is able to use it in a limited capacity.

2.2 Local Exchange Navigation System (LENS)

A. Description of project

LENS is BellSouth's proprietary Pre-Ordering/Ordering system. LENS provides access to the following functions:

- Pre-Ordering
 - Address validation
 - Telephone number reservation
 - Service and Features availability
 - Appointment Calendar
 - Customer service records
- Ordering
 - Placement an Order for the following account level activity types (A=new, W=switch as is, V=switch as specified, R=record change, D=disconnect, S=suspend, L=seasonal suspension, Y=deny)
 - Due Date Calculation and Confirmation
 - Firm Order Confirmation
 - Completion Notification
 - Viewing Order Status
 - Viewing LSRs in Error

B. General Information

AT&T plans on using some of the LENS Pre-Ordering functions to replace certain selected interim interfaces currently in use, solely for initial market entry purposes. Because LENS does not provide parity, AT&T does not plan to continue to use the LENS Pre-Ordering interface once the Pre Order Gateway (EC-Lite) solution is fully implemented.

AT&T continues to request that BellSouth provide documentation and correct deficiencies in LENS, including institution of a change control process to eliminate LENS instability.

C. Status

Milestone	Date Required	Date Accomplished	Status
Training	6/23/97	6/23/97	Completed
Dev. Work Center Operational Agreement	6/25/97		AT&T has been unable to get BellSouth to meet to complete the documentation of the manual procedures required. As a result, AT&T has not been able to use LENS for consumer

Milestone	Date Required	Date Accomplished	Status
			service. AT&T is currently trialing the use of LENS with undocumented procedures for business customers.
Move to Production	7/1/97		

2.3 Pre-Order Gateway

A. Description of project

As described in the AT&T / BellSouth Georgia Interconnection Agreement, Attachment 15, Paragraph 7.1.2, the Pre Order Gateway is *"a transaction-based electronic communications interface according to the AT&T proposed data model for preordering... an exchange protocol based upon a subset of CMIP transactions, referred to as EC-Lite...."*

AT&T requires the following inquiries:

- Switch/Feature Availability
- Address Verification (on an exception basis when batch feed data is incomplete)
- Telephone Number Assignment
- Appointment Scheduling
- Customer Service Record Availability

B. General Information

The AT&T/BellSouth Georgia Interconnection Agreement requires the deployment of the Pre Order Gateway by 12/31/97, unless modified by mutual agreement. AT&T has requested BellSouth to implement the interface on December 15, 1997 (in order to begin SRT), and BellSouth has agreed to make its best efforts to meet the December 15, 1997 request.

BellSouth and AT&T mutually agreed to requirements regarding the necessary capabilities for the Pre Order Gateway in the specifications defined in March, 1997. However, notwithstanding AT&T's continued negotiations with BellSouth, ***BellSouth has now indicated that it will not comply with the mutually agreed upon specifications in the following areas:***

1. The ability to obtain a firm calculated due date at parity with the due dates BellSouth provides itself. BellSouth currently plans to provide due date intervals, not access to the system it uses to schedule such appointments.
2. The ability to receive Customer Service Record information from BellSouth in such a way as to use it to populate AT&T systems and databases, again, to have a parity access to that BellSouth provides itself.

BellSouth's proposed system requires AT&T to manually re-enter the information into its service orders.

3. The ability to obtain parity access to telephone numbers. BellSouth plans on limiting AT&T's access to 100 numbers per switch, or 5% of the numbers available, whichever is less.

As a result of BellSouth not complying with the mutually agreed to specifications, AT&T's customers will experience increased order placement time, service delivery time and error rates which BellSouth customers will not encounter.

C. BellSouth's August 1, 1997, Status Update.

In the Background Section of the August 1, 1997, status update, BellSouth's introduced, for the first time, milestones and deliverables that have never been discussed or negotiated by the BellSouth/AT&T Joint Implementation Team. This section also fails to provide complete dates and status information. As such, it is misleading and incomplete.

Indeed, BellSouth states that the parties have been working together to plan and implement the system since January 3, 1997. AT&T repeatedly attempted to work with BellSouth well in advance of that date, having delivered its first pre-ordering specifications to BellSouth on October 9, 1996 (not on December 9, 1996, as is stated in BellSouth's report).

BellSouth also claims that *"on February 19, 1997, a major architecture change was initiated by AT&T, which resulted in a large amount of unanticipated time and effort in the re-work of the detailed design document...."* This is misleading. Under the Interconnection Agreement, the parties were to work together to "substantially define mutually agreeable specifications" by March 1, 1997. AT&T's changes, therefore, were part of this effort and not the extraordinary event BellSouth suggests. Moreover, AT&T finds it difficult to believe that a "detailed design document" had been prepared by BellSouth since BellSouth was unwilling to meet with AT&T to discuss the specifications until January 23, 1997, because of a claimed lack of resources to devote to the project.

C. Status

Milestone	Date Required	Date Accomplished	Status
Mutually Agree to Requirements/Specification (JIA)	5/15/97	5/15/97	Completed
Develop Test Plan	6/30/97	6/30/97	Completed
Perform Joint Testing	12/15/97		To Begin 8/20 - On Target
Dev. Work Center Operational Agreement	12/15/97		To Begin 10/01 - On Target
Move to Production	12/15/97		To Begin 12/15 - On Target

3. Ordering - EDI

As described in the AT&T / BellSouth Georgia Interconnection Agreement, Attachment 15, Paragraph 5.1.1 the exchange of information for ordering and provisioning of local service will be *"based upon the most current interpretations of the American National Standards Institute (ANSI) Accredited Standards Committee (ASC) X 12 Standards as documented by the Service Order Subcommittee (SOSC) of the Telecommunications Industry Forum/Electronic Data Interchange (TCIF/EDI) committee."*

3.1 TCIF Issue 7

A. Description of project

As described in the AT&T / BellSouth Georgia Interconnection Agreement, Attachment 15, Paragraph 5.1.5, "AT&T and BellSouth will... *adapt the interface based on evolving standards...within 7 months of the publication date of the TCIF/SOSC guidelines....*"

B. General Information

The draft version of TCIF Issue 7 is dated June, 1997, and has been available on the Internet for approximately two months. AT&T and BellSouth currently disagree on the "Publication Date" of TCIF Issue 7.

AT&T continues to focus resources to meet the previously targeted December 15, 1997 TCIF Issue 7 deployment date. AT&T has requested BellSouth to jointly meet during either the week of August 25, 1997 or the week of September 9, 1997 to identify the Issue 7 requirement definition gaps and finalize the deployment milestones. At this time, BellSouth has not confirmed their attendance in the proposed joint meeting. ***It is critical that AT&T and BellSouth mutually agree to the requirements and specifications by September 15, 1997 in order to not jeopardize the December 15, 1997 Issue 7 deployment date.***

C. Status

Milestone	Date Required	Date Accomplished	Status
Mutually Agree to Requirements/Specification (EDI Mapping)	9/15		AT&T is attempting to schedule a joint meeting with BellSouth to understand and close Requirement Definition gaps.
Develop Test Plan	10/31		To Begin 10/1
Perform Joint Testing	12/12/97		To Begin 11/14
Dev. Work Center			To Begin 11/14